



April 25, 2000

Steering Committee

Children Now
Civil Rights Forum on
Communications Policy
Communications Workers of America
Consumer Federation of America
League of United Latin
American Citizens
National Association of the Deaf
National Organization for Women
National Urban League
Project on Media Ownership
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Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554.

Re: People for Better TV Reply Comments
MM Docket No. 99-360

Dear Ms. Salas:

Please find attached one original and four copies of the People for Better TV Reply Comment in response to the Notice of Inquiry into the Public Interest Obligations of Television Broadcasters.

We are also submitting a diskette copy of this filing.

Thank you for your attention to this matter.

Sincerely,


Mark Lloyd

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of)
Public Interest Obligations)
Of TV Broadcast Licensees)

MM Docket No. 99-360

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FEDERAL COMMUNICATIONS COMMISSION
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**REPLY COMMENTS
of
PEOPLE FOR BETTER TV**

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April 25, 2000

SUMMARY

People for Better TV submits these Reply Comments on behalf of its steering committee and members representing viewers from throughout the country. In our Comments, People for Better TV presented submissions from these individuals and organizations which demonstrated that many broadcasters are currently failing to serve the needs of their local communities. We argued that the Commission should use the transition to digital broadcasting as an opportunity to renew and strengthen broadcasters' obligations to their communities of license. Specifically, we maintained that the Commission should adopt: 1) minimum public interest standards that apply to all digital channels; 2) privacy and price protections for consumers; 3) regulations to ensure that broadcasters provide a reasonable amount of children's programming as well as more ratings information; 4) minimum requirements for local public affairs programming and PSA's; 5) requirements that broadcasters seek input from the community and disclose public interest activities in a meaningful and easily accessible way; 6) measures to increase access to DTV by disabled individuals; and 7) rules to ensure that broadcasting is a diverse industry offering programming for traditionally underserved groups including minority and non-English-speaking viewers. People for Better TV is gratified that so many Commenters expressed their agreement with our positions.

In these Reply Comments, People for Better TV addresses the arguments of broadcasters who claim that the transition to digital does not justify the imposition of public interest obligations. We maintain that the Commission has both statutory and constitutional authority to adopt public interest obligations for broadcasters on all channels including ancillary and

supplementary ones. Indeed, broadcasters agreed to this *quid pro quo*, and received free spectrum in exchange for meeting community needs.

People for Better TV also responds to broadcasters' claims that imposing obligations are unnecessary or unfairly burdensome on broadcasters. These parties claim that the Commission should rely on market forces to ensure that community needs are met. People for Better TV's Comments as well as those of multiple other parties demonstrated the fallacy of these arguments by providing evidence of broadcasters' current failures to meet community needs. Commenters representing viewers from around the country agreed with People for Better TV that the Commission should adopt minimum public interest obligations that hold broadcasters to higher standards. These standards should include measures to ensure that broadcasters serve children by providing more educational programming and additional ratings information and by shielding them from targeted advertising.

People for Better TV also argues that while many public television stations have traditionally done an exemplary job of serving their communities, the digital television public interest obligations should apply to noncommercial licensees as well to ensure that all such stations maintain the level of service the public deserves. Finally, the Commission should adopt these rules now to afford broadcasters, the Commission, and the public the benefits of clearly articulated standards. To this end, the Commission should initiate a rulemaking proceeding in this matter as soon as possible.

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**REPLY COMMENTS
of
PEOPLE FOR BETTER TV**

On behalf of its steering committee and its members, People for Better TV respectfully submits Reply Comments in response to the Federal Communications Commission's ("Commission" or "FCC") Notice of Inquiry, *In the Matter of Public Interest Obligations of TV Broadcast Licensees*, MM Docket No. 99-360 (rel. Dec. 20, 1999) ("NOI"). People for Better TV's steering committee includes the following organizations: Children NOW, Civil Rights Forum on Communications Policy, Communications Workers of America, Consumer Federation of America, League of United Latin American Citizens, National Association of the Deaf, National Organization for Women, National Urban League, Project on Media Ownership and U.S. Catholic Conference. A list of all of People for Better TV's members is included in our Comments at Appendix B.

In our Comments, People for Better TV presented submissions from individuals and organizations from across the nation which demonstrated that many broadcasters are currently failing to serve the needs of their local communities. We argued that the Commission should use the transition to digital broadcasting as an opportunity to renew and strengthen broadcasters' obligations to their communities of license. Specifically, we maintained that the Commission

should adopt: 1) minimum public interest standards that apply to all digital channels; 2) privacy and price protections for consumers; 3) regulations to ensure that broadcasters provide a reasonable amount of children's programming as well as more ratings information; 4) minimum requirements for local public affairs programming and PSA's; 5) requirements that broadcasters seek input from the community and disclose public interest activities in a meaningful and easily accessible way; 6) measures to increase access to DTV by disabled individuals; and 7) rules to ensure that broadcasting is a diverse industry offering programming for traditionally underserved groups including minority and non-English-speaking viewers.

People for Better TV is gratified that so many Commenters expressed their agreement with our positions.¹ Thus, rather than restate our arguments, People for Better TV will use these Reply Comments to address the Comments of those parties that offer conflicting views. We also note that the surge of public support for regulating digital broadcasters indicates that the time is right for the Commission to initiate a rulemaking in this matter, and we renew our request for prompt Commission action.

B. The Commission Has the Authority to Adopt Public Interest Obligations for Digital Broadcasters.

As People for Better TV explained in our initial Petition for Rulemaking, Congress mandated in the Telecommunications Act of 1996 ("1996 Act") that the Commission adopt public interest obligations for digital broadcasters. Moreover, the Courts have consistently upheld the Commission's authority to regulate broadcasters. Thus, the suggestions by some

¹*See, e.g.,* UCC, *et al.* Comments; Benton Foundation ("Benton") Comments; Michigan Consumer Federation Comments; Community Technology Policy Council Comments; Capitol Broadcasting Comments.

Commenters that the Commission lacks authority to act in this area are incorrect.

A. The 1996 Act Clearly Mandates that the Commission Adopt Public Interest Obligations for Digital Broadcasters.

The National Association of Broadcasters' ("NAB") suggestion that the transition to digital broadcasting does not provide the Commission with the authority to promulgate enhanced public interest obligations demonstrates a misunderstanding of the facts and the law.²

Commenters are not seeking new obligations for digital broadcasters but rather seeking clarification of the obligations that Congress and the Commission have already stated should apply to digital broadcasters.

The Commission has the statutory authority to act. In the 1996 Act, Congress directed the Commission to determine the public interest obligations of digital broadcasters. In Section 336, Congress acknowledged that the Commission was authorized to "issue additional licenses for advanced television services."³ As we indicated in our Comments, Congress' noted in that same section:

Nothing in this section shall be construed as relieving a television broadcasting station from its obligation to serve the public interest, convenience, and necessity. In the Commission's review of any application for renewal of a broadcast license for a television station that provides ancillary or supplementary services, the television licensee shall establish that all of its program services on the existing or advanced television spectrum are in the public interest.⁴

This statement makes clear that Congress intended the licenses to be issued with accompanying public interest obligations. The legislative history also supports this position. The

²See NAB Comments at 4.

³47 U.S.C § 336(a) (1996).

⁴47 U.S.C § 336(d) (1996).

House of Representatives conference report explicitly “adopts the Senate language that the Act’s public interest obligations extend to the new licenses and services.”⁵ Thus, Congress passed the 1996 Act with the understanding that digital broadcasters would be obligated to serve the public interest, convenience, and necessity.

Indeed, People for Better TV maintains that the Commission should have adopted these obligations as soon as it issued the digital licenses. As we noted in our Petition for Rulemaking, Section 336(b) provides that in “prescribing the regulation required by subsection (a), the Commission shall... (5) prescribe such other regulations as may be necessary for the protection of the public interest, convenience and necessity.”⁶ Section 336(a) is entitled “Commission Action” and sets out requirements “if the Commission determines to issue additional licenses for advance television services...”⁷ Thus, the Commission’s decision to issue digital licenses obligated it to adopt accompanying public interest obligations.

The Commission has also acknowledged that the development of digital technology engendered new responsibilities. In the *Advanced Television Systems and Their Impact Upon the Existing Broadcast Service, Fifth Report and Order*, the Commission stated, “[t]he dynamic and flexible nature of digital technology creates the possibility for new and creative ways to serve the country and the public interest.”⁸

Thus, in the NOI, the Commission asked how to apply current regulations in the digital

⁵H.R. CONF. REP. NO. 458, 104th Cong., 2nd Sess. 30 (1996).

⁶47 U.S.C § 336(b)(5) (1996).

⁷47 U.S.C § 336(a) (1996).

⁸12 FCC Rcd 12809,12813 (1997) (“*Fifth Report and Order*”).

television environment. As the Consumer Federation of America noted in its Comments, both market forces and technological capacity are changing and the Commission must adapt the public interest standard accordingly.⁹ Moreover, digital broadcast is a unique service; and just as the Commission made distinctions regarding the public interest standard to be applied to different public spectrum licensees, it must look on digital television differently. MMDS licensees, CB licensees, and radio licensees are all held to public interest standards different from analog television licensees, though they all use the public airwaves. Digital television is significantly different from analog television: digital broadcasters can send multiple channels, analog broadcasters cannot; digital broadcasters can provide wireless datacasting services, analog broadcasters cannot. Indeed, it may be easier for digital broadcasters to provide public interest service which analog broadcasters simply did not have the capacity to provide. The Commission would be doing a disservice to both broadcasters and the public if it fails to recognize distinctions between analog and digital broadcasters, and to interpret the public interest standard accordingly. Indeed, the Supreme Court's statement that, "the weighing of policies under the 'public interest' standard is a task Congress has delegated to the [Federal Communications] Commission in the first instance,"¹⁰ does not suggest a crude act of cutting and pasting one set of rules to apply to all services, but an exercise of technical judgment suited to an expert agency.

⁹See CFA Comments.

¹⁰*FCC v. WNCN Listeners Guild*, 450 U.S. 582, 596 (1981) quoting *FCC v. Nat'l Citizens Comm. for Broadcasting*, 436 U.S. 775, 810 (1978).

B. Broadcasters Received Free Spectrum in Exchange for Fulfilling Public Interest Obligations.

Some Commenters maintain that the government does not own the spectrum, and that there should not be a *quid pro quo* of adhering to public interest obligations in exchange for spectrum.¹¹ In fact, some argue that the transition to digital imposes a burden on broadcasters – one that will fall especially hard on minority-owned stations.¹²

Such claims are misguided. Broadcasters have always been licensees, not spectrum owners, and renewal of their licenses has always been conditioned on their meeting their obligations to the public.¹³ Moreover, Congress dictated that the new digital licenses come with public interest obligations. As UCC, *et al.* notes in their Comments, the broadcasters themselves rejected a digital spectrum fee on the grounds that instead, they would continue to fulfill their “social compact” with the public.¹⁴ Congress agreed to allot digital licenses for free only to incumbent broadcasters in exchange for the broadcasters’ commitment to use technology in ways that best serve their communities of license.

Furthermore, broadcasters’ suggestion that there should not be a *quid pro quo* of fulfilling to public interest obligations in exchange for spectrum ignores the history of broadcast regulation. Both the 1934 Communications Act and the 1996 Act have consistently been

¹¹See CBS Comments at 31; Media Institute Comments at 20; NAB Comments at 8.

¹²See Belo Comments at 19-20; National Minority TV Comments at 3.

¹³See 47 U.S.C. § 309(a) (1996).

¹⁴See UCC, *et al.* at 3, citing Henry Geller, *Implementation of “Pay” Models and the Existing Public Trustee Model*, in DIGITAL BROADCASTING AND THE PUBLIC INTEREST 227, at 233 (1998).

interpreted to mean that a license carries with it obligations to serve the public interest. As the FCC noted in the *Fifth Report and Order*, “[w]e recognize that digital broadcasters remain public trustees with a responsibility to serve the public interest.”¹⁵

III. Ancillary and Supplementary Services are Broadcast Services Subject to Public Interest Obligations.

Similarly, NAB’s argument that ancillary and supplementary services should be regulated as non-broadcast services¹⁶ is inconsistent with the 1996 Act. Congress specifically mandated public interest responsibility for any ancillary or supplemental uses of the DTV spectrum so that there would be no confusion that the public interest standard attends to all DTV uses of the spectrum. Section 336(a)(2) of the Act states that the Commission shall adopt regulations that allow the holders of such licenses to offer such ancillary or supplementary services on designated frequencies as may be consistent with the public interest, convenience, and necessity.¹⁷

Moreover, Congress drafted Section 336 in a way that intertwines the regulations for the primary programming channels and ancillary and supplementary services. The statute offers no indication that the ancillary and supplementary services were not intended to be regulated as broadcast services. Indeed, the fact that the broadcasters’ use of their ancillary services will be considered during license renewal¹⁸ and that fees are charged for any commercial, non-public use of the airwaves “to recover for the public a portion of the value of the public spectrum resource

¹⁵12 FCC Rcd at 12810.

¹⁶See NAB Comments at 20.

¹⁷47 U.S.C. § 336(a)(2) (1996).

¹⁸47 U.S.C. § 336(d) (1996).

made available for such commercial use,”¹⁹ makes it clear that ancillary and supplementary services should be considered a component of the broadcasters’ services that were intended to serve the public.

D. The Commission’s Adoption of Additional Public Interest Obligations Would be Constitutional.

The Courts have consistently maintained that broadcasting must be evaluated differently from other modes of communication and that additional regulation is justified. Some broadcasters suggest that the Commission should “carefully consider” whether adopting new public interest obligations on broadcasters would impinge on broadcasters’ First Amendment rights.²⁰ These Commenters argue that regulation justified under the scarcity doctrine may not withstand judicial review because some jurists in lower courts reject the doctrine.²¹ The broadcasters also maintain that the expansion of the number of media outlets makes the scarcity doctrine obsolete.²² The broadcasters’ arguments are not persuasive.

The Supreme Court has not changed its position on the Commission’s authority to regulate broadcasters. Indeed, the Courts have continually reaffirmed that *Red Lion Broadcasting Co. v. FCC*, 395 U.S. 367, 390-91 (1969), and its progeny are still good law and that regulation

¹⁹47 U.S.C. § 336(e)(2)(a) (1996).

²⁰*See e.g.*, NAB Comments at 11; CBS Comments at 19-20.

²¹*See, e.g.*, NAB Comments at 12; CBS Comments at 19-20; Media Institute Comments at 19; Belo Comments at 14; Progress and Freedom Foundation Comments at 8-9.

²²*Id.*

of broadcasting is justified by the scarcity of broadcast licenses.²³ While some judges in lower court decisions have expressed dissatisfaction with the Supreme Court's holding, these grumblings carry little weight. Indeed, circuit courts continue to apply *Red Lion*.²⁴ The Commission is bound by law to adhere to the rulings of the Supreme Court.²⁵

The Commission should disregard the arguments made by some broadcasters that the scarcity doctrine should no longer apply because of the explosive growth of media. The rationale for the scarcity still exists. As evidenced by the deluge of Comments received in the low power radio proceeding, there are much fewer frequencies available than there are people who would like to broadcast. In addition, Congress perpetuated license scarcity by limiting licenses only to incumbent broadcasters.

As UCC, *et al.* details in its Comments, television broadcasting service remains unique.²⁶ Broadcasting is the only service that reaches nearly every household in the United States at no cost.²⁷ Americans rely on television as their primary source for news and information; and only

²³See, e.g., *Turner Broadcasting System, Inc. v. FCC*, 114 S.Ct. 2445, 2457 (“[a]lthough courts and commentators have criticized the scarcity rationale since its inception (footnote omitted), we have declined to question its continuing validity as support for our broadcast jurisprudence, ... and see no reason to do so here.”).

²⁴See, e.g., *FCC v. Nextwave Personal Comm. Inc.*, 200 F. 3d 43 (2nd Cir. 1999).

²⁵Some Commenters raise additional First and Fifth Amendment issues regarding broadcasters' provision of free time for political discourse. People for Better TV believes that these concerns were addressed in the Comments of Alliance for Better Campaigns.

²⁶See UCC, *et al.* Comments at 12.

²⁷*Id.*, citing *Review of the Commission's Regulations Governing Television Broadcasting; Television Satellite Stations Review of Policy and Rules*, 14 FCC Rcd 12903, 12923 (1999) (“*Local Broadcast Ownership Order*”).

broadcasting provides original news and informational programming on local issues.²⁸ These findings undermine the arguments made by some Commenters that the Commission should consider all communications technologies that compete in same market when regulating broadcasting.²⁹ The development and growth of other media has not changed the unique role that television broadcasting plays in this country.

II. The Commission Must Adopt Minimum Public Interest Obligations for All Broadcasters.

The Commission must act promptly to ensure that digital television develops in a way that serves the public. Evidence offered by several Commenters demonstrates that the Commission cannot rely on market forces to ensure that the community of license is served. Moreover, now is the time for Commission action. The broadcasters and the public need the certainty of established rules defining public interest obligations. Any delay would allow broadcasters to invest in business models that might not best serve the public.

The Commission should adopt public interest obligations for all broadcasters including noncommercial educational (“NCE”) stations. While many NCE broadcasters are doing an exemplary job of serving the public and will probably continue to do so into the digital age, the Commission must promulgate rules that apply to everyone. Such an approach will provide a useful means of evaluating those noncommercial broadcasters that are not responsive to their communities while simultaneously benefitting responsive broadcasters by providing direction

²⁸*Id.*

²⁹*See* NAB Comments at 5-6; Media Institute Comments at 7; Progress and Freedom Foundation Comments at 15.

and enhancing the reputation of NCE broadcasting.

A. Market Forces are Insufficient to Ensure that Community Needs are Met.

Several parties have demonstrated in their Comments that broadcasters are not currently meeting their obligations to serve their communities of license. Thus, the Commission should adopt minimum public interest obligations that incorporate higher standards, including measures that ensure that broadcasters serve children's needs.

1. Broadcasters are Not Currently Serving Their Communities of License.

Several parties including People for Better TV provided evidence in their Comments that the Commission cannot rely on the market to ensure that communities are well-served. In our Comments, we attached numerous letters from viewers throughout the nation who were dissatisfied with the programming and service offered by their local broadcasters. The letters described viewers' concerns about the lack of local public affairs programming, the absence and low quality of children's programming, and the dearth of programming geared to traditionally underserved audiences including minority groups. These letters provided the Commission with the perspectives of real viewers from beyond the Beltway.

Our findings were reinforced by Comments submitted by other parties including: United States Catholic Conference, which described the difficulty in placing religious programming³⁰; Benton Foundation, which documented the lack of public affairs programming³¹; LULAC,

³⁰See United States Catholic Conference Comments at 4-8.

³¹See Benton Foundation Comments at 2-4.

which expressed concern about the absence of programming aimed at Latinos³²; and Michigan Consumer Federation which noted that some local stations offer no local news³³. Together, these submissions clearly demonstrate that the market is not currently working to provide the programming sought by the communities of license. Based on this evidence of viewer dissatisfaction with the licensees, the Commission cannot expect that market forces will be sufficient to ensure that community needs are met in a digital world.

These submissions from Commenters undermine the claims by some broadcasters that the industry is already providing an ample amount of public service.³⁴ Notably, these broadcasters' claims are based for the most part on studies prepared by NAB which purport to document the amount of money the broadcasters have expended on serving the public. In our Comments, People for Better TV included a report from the Project on Media Ownership ("PROMO") which determined that the NAB's 1998 study on broadcasters' public service efforts suffered from so many methodological flaws that it can be considered only a public relations document rather than a legitimate scientific study.³⁵ In these Reply Comments, we have attached at Appendix A, a

³²See LULAC Comments at 2-4.

³³See Michigan Consumer Federation Comments at 5.

³⁴See CBS Comments at 7-8 ; Belo Comments at 7; National Minority TV Comments at 2; NAB Comments at 9.

³⁵See PBTv Comments at App. 2. PROMO analyzed the NAB report entitled, "A National Report on the Broadcast Industry's Community Service" April 1998. PROMO found that the report was flawed because: 1) it was based on unaudited self-reporting by stations; 2) the sample was incomplete; 3) it included data from both networks and television stations which are operated very differently and inappropriately extrapolated data from one type of business to the other. Based on its analysis, PROMO concluded that "[t]he study appears to be more of public relations brochure than an objective study."

Methodological Evaluation by PROMO that presents a similar analysis of NAB's recent report on its community service efforts from August 1998 through July 1999. According to PROMO, despite NAB's assertions that it improved its methodology, the April 2000 Report exhibits many of the same problems present in NAB's 1998 Report.³⁶ PROMO concluded, "[t]he aim of both the 1998 and 2000 reports seems to be to positively portray the community service efforts of the broadcasters rather than to present an unbiased analysis of the data the broadcasters are reporting."³⁷

Moreover, other research indicates that the broadcasters have inflated their figures concerning the amount of money spent on PSA's by estimating the cost of all PSA's at the "run-of-station" rate which averages both prime-time and non-prime-time rates. In reality, few broadcasters air PSA's during prime-time. For example, according to a report by the American Association of Advertising Agencies and the Association of National Advertisers measuring network activity, in November 1996, UPN aired no prime-time PSA's; Fox aired 2 seconds per prime-time hour; CBS aired 3 seconds; WB aired 6 seconds, ABC aired 9 seconds and NBC aired 11 seconds.³⁸

Furthermore, even if broadcasters donated significant sums of money to local organizations, their obligations as corporate citizens are distinct from their obligation to serve the

³⁶Indeed, PROMO states that only one of NAB's stated improvements, *i.e.*, including all commercial radio and television stations in its survey rather than including only NAB members, had any noticeable impact on its results.

³⁷See Appendix A at 7.

³⁸See Heather Fleming, *PSA Slice Shrinks as Commercial Pie Grows*, Broadcasting & Cable, Mar. 31, 1996, at 19.

community by providing programming that caters to local viewers.³⁹ Donations of money to different charities does not exempt broadcasters from other public interest obligations. The NAB's report and others like it fail to offer any reasoned response to the evidence from Commenters demonstrating viewers' dissatisfaction with broadcasters' efforts.

2. The Commission Should Adopt Minimum Public Interest Obligations that Hold Broadcasters to Higher Standards.

The Commission should adopt the proposals offered by many Commenters including People for Better TV to hold broadcasters to higher standards. Commenters argued that broadcasters should serve the public better by airing a minimum amount of local programming⁴⁰; providing a minimum amount of PSA's⁴¹; ascertaining community needs, and reporting on public

³⁹The Commission has continually reaffirmed that broadcasters must serve the community through programming. Even as it lifted many of the application and reporting requirements it had imposed on broadcasters to ensure their service in the public interest, the Commission stated:

[T]he basic, underlying concern that radio broadcasting addressed issues with programming has been a constant theme at all times in the regulation of broadcasting....[T]he chief concern has always been that issues of importance to the community will be discovered by broadcasters and addressed in programming.... Accordingly, we will require that stations program to address those issues ...

Deregulation of Radio, 49 RR2d 1, 13 (1981). Similarly, in its order deregulating television, the FCC emphasized that broadcasters must meet their statutory obligation to serve the public interest with programming, stating: "[W]e are not in this proceeding relieving a licensee of all programming responsibilities....[T]he only programming obligation of a licensee should be to provide programming responsive to issues of concern to its community of license." *Deregulation of Commercial Television*, 56 RR2d 1005, 1019 (1984).

⁴⁰See Capitol Broadcasting Comments at 9.

⁴¹See *id.* at 8; Benton Comments at 8.

interest efforts.⁴² The Commission clearly has the authority to mandate these requirements, *see infra*, and its failure to do so would amount to allowing broadcasters to shirk their community responsibilities.

In addition, People for Better TV agrees with those Commenters that suggest that the Commission adopt measures designed to serve children by enhancing the amount of educational programming available to them, providing more useful ratings information to parents, and shielding children from targeted advertising.⁴³ The Commission knows from experience that without clear rules, broadcasters have consistently failed to meet children's needs.⁴⁴

The Commission should reject NAB's arguments that imposing obligations on broadcasters results in unjustified costs. NAB argues that obligations like enhanced disclosure of public interest efforts,⁴⁵ enhanced ratings,⁴⁶ and posting of public file information and community forums on the Internet,⁴⁷ should not be implemented without considering the cost to broadcasters. Similarly, while many parties agreed with People for Better TV about the need for enhanced

⁴²*See* UCC, *et al.* Comments at 23-25; Capitol Broadcasting Comments at 6-7; LULAC Comments at 5; Benton Comments at 8, 14.

⁴³*See, e.g.,* Benton Comments at 11-14; CME, *et al.* Comments.

⁴⁴*See, e.g.,* *ACT v. FCC*, 821 F. 2d 741, 745 (D.C. Cir. 1987) (“[t]he FCC’s regulation of children’s television was founded on the premise that the television marketplace does not function adequately when children make up the audience.”)

⁴⁵*See* NAB Comments at 23.

⁴⁶*See id.* at 18.

⁴⁷*See id.* at 27-28.

access to DTV for people with disabilities,⁴⁸ NAB maintains that the current rules are sufficient.⁴⁹

Congress has not directed the Commission to do the type of balancing that NAB suggests. Instead, the Commission is charged only with ensuring that broadcasters serve the public interest. Through this proceeding, the viewers have articulated their needs; and broadcasters agreed to take on the “costs” of meeting these needs when they argued that digital licenses should be allotted at no charge only to incumbent broadcasters. Thus, the Commission should require broadcasters to adhere to the stricter requirements outlined by People for Better TV and other parties.

Similarly, the Commission should disregard claims by NAB that adopting minimum obligations,⁵⁰ requiring ascertainment,⁵¹ and promoting diversity,⁵² are unnecessary and amount to a reversal of FCC’s deregulatory policies. Instead, the Commission should consider the numerous Comments demonstrating that broadcasters are not currently fulfilling obligations. The Commission should heed the words of the Court in *Office of Communication of United Church of Christ v. FCC*: “the Commission has always viewed its regulatory duties as guided, if not limited, by our national tradition that public response is the most reliable test of ideas and

⁴⁸See e.g., WGBH Media Access Division Comments; Telecommunications for the Deaf, Inc. Comments; Benton Comments at 11; Capitol Broadcasting Comments at 9-10; UCC, *et al.* Comments at 21-22.

⁴⁹See NAB Comments at 39.

⁵⁰See *id.* at 33-38.

⁵¹See *id.* at 25.

⁵²See *id.* at 44.

performance in broadcasting as in most areas of life.”⁵³ Thus, the Comments filed in this proceeding should be viewed as a call to action justifying prompt Commission action to ensure that broadcasters fulfill their obligation to serve the public interest.

B. Broadcasters, the Commission and the Public will Benefit from the Certainty Provided by Establishing Rules Now.

The Commission should adopt rules now to create the certainty that broadcasters and the public need going forward into the digital age. Some Commenters claim that the Commission cannot adopt new regulations because it would stifle innovation.⁵⁴ These broadcasters argue that the Commission should not adopt rules, especially for multicasting, until DTV can develop more fully.⁵⁵ However, People for Better TV agrees with the Comments of UCC, *et al.* which argue that regulatory certainty allows broadcasters to move forward more quickly by providing them with guidance on how to use the spectrum they have been given.⁵⁶ Digital broadcasters can plan for the future without worrying that their business models will be made obsolete by future FCC regulation.

Adopting regulations now also benefits the Commission and the public. The Commission would have more difficulty regulating broadcasters once their business models become entrenched. The Commission’s past experience demonstrates the value of regulating early. For example, the Commission has recently struggled to impose equitable local broadcast

⁵³359 F.2d 994, 1003 (D.C. Cir. 1966).

⁵⁴See NAB Comments at 11; Named State Broadcasters Assn. Comments at 4; ALTS Comments at 9; APTS Comments at 17.

⁵⁵See, *e.g.*, NAB Comments at 3, 17.

⁵⁶See UCC, *et al.* at 4-5.

ownership regulation after allowing broadcasters to move forward into business arrangements without providing clear guidance about their legality.⁵⁷ Similarly, the Commission faced great difficulty regulating children's television once broadcasters became invested in business models that included offering only a minimal amount of educational programming.

The public benefits from early regulation because it allows them to evaluate more easily broadcasters' conduct from an early stage. Facilitating citizen review also aids the Commission because the agency relies on the public to monitor broadcaster behavior. As the Commission noted in *Deregulation of Radio*, "[w]e expect and encourage the public to keep the Commission informed as to how well the marketplace is performing. Based upon complaints from the public, we will monitor market performance."⁵⁸ The public can better assess their local station's compliance if the broadcasters are required to adhere to clear standards.

C. Noncommercial Educational Broadcasters Must Be Held Accountable to Their Communities of License.

While People for Better TV agrees with APTS that many noncommercial educational ("NCE") broadcasters are meeting community needs by providing children's programming, local public affairs programming and accessibility to disabled viewers, these stations' current compliance with FCC regulations does not justify exempting all NCE stations from Commission rules regarding public interest obligations for digital broadcasters. People for Better TV maintains that these obligations should apply to all broadcasters on all channels that they use including ancillary and supplementary services.

⁵⁷See *Local Broadcast Ownership Order*.

⁵⁸73 FCC 2d 457, 535 (1979).

People for Better TV's investigation into broadcast practices throughout the country found that many public broadcasters are doing a wonderful job of serving their communities. In fact, many public broadcasters lead the way in providing access to the sight and hearing-impaired, providing educational programs for children, and offering the sort of public discussion too often lacking at the commercial stations. Nevertheless, rather than providing a rationale for forbearance, the stations' current adherence to the rules demonstrates that the rules serve a useful purpose. Moreover, to the extent that public stations are already fulfilling the Congressional mandate to serve the public interest, the application of enhanced public interest obligations should not pose any new burdens on their operations. While APTS argues that exempting the stations from digital public interest obligations would be consistent with current regulations,⁵⁹ they are overstating the reality. Most of the Commission's current exemptions concern the payment of fees; and these exceptions reflect the stations' non-profit status and not their reputation for public service.

Similarly, the Commission should apply public interest obligations to ancillary and supplementary services. As People for Better TV outlined *infra*, Congress intended the Commission to ensure that these services serve the public interest, convenience and necessity. Public television stations' plans to use these channels as revenue-producing entities does not eliminate this responsibility, but rather enhances it. APTS incorrectly implies that services that produce revenue cannot be used simultaneously to serve the public interest.

Furthermore, while People for Better TV recognizes that many public stations are serving

⁵⁹APTS Comments at 18.

their community, we also maintain that these practices are not universal. In our Comments, People for Better TV submitted evidence to the Commission that several public television stations are not serving their communities of license. In Columbia, South Carolina and Chicago, Illinois, viewers had difficulty accessing the public stations' public files. When they did view the files, they found them to be incomplete.⁶⁰ Similarly, Citizens for Independent Public Broadcasting, a member of the People for Better TV coalition, reports in its Reply Comments filed in this proceeding that the management of the public television stations in Pittsburgh has a history of being unresponsive to local community concerns.⁶¹

Public stations' failure to provide adequate service to local communities results in part from the absence of clear guidelines, and in part from a lack of financial resources. In our Comments, we have urged the Commission to address both of these problems. The Commission should adopt clear public interest standards to provide the guidance that all stations need. In addition, the Commission should adopt our flexibility proposal which would allow commercial stations to explore satisfying their public interest obligations by providing direct support to local public television stations. Through these measures, the Commission will better ensure that all NCE stations meet the high standards that the public expects and deserves.

CONCLUSION

Congress directed the Commission to use the transition to digital television as an

⁶⁰See Letters from Dorothy Garrick, Columbia South Carolina; Erica Trocchio, Chicago, Illinois; Rose Economou, Chicago, Illinois; Nick Arvantis and Arjumad Khan, Chicago, Illinois, in People for Better TV Comments at App. D.

⁶¹See Citizens for Independent Public Broadcasting Reply Comments at Section I.

opportunity to ensure that all broadcasters are serving their communities of license. Congress clearly indicated that these responsibilities should apply to all channels including those used for ancillary and supplementary services. Evidence provided by People for Better TV and others indicates that the broadcasters are not presently meeting their obligations. Thus, the Commission cannot reasonably expect market forces alone to prompt broadcasters to provide the requisite amount of public interest programming and service. The Commission should see the comments of dissatisfied viewers throughout the country as a call to action to develop clear public interest standards. To begin this important endeavor, the Commission should take the first step of initiating a rulemaking on this matter.

Respectfully Submitted,

A handwritten signature in black ink, reading "Randi M. Albert", written over a horizontal dashed line.

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April 25, 2000

APPENDIX A

A Methodological Evaluation of the NAB Report
entitled
“A National Report on the Broadcast Industry's
Community Service”
(April 2000)

A Project on Media Ownership Report
Principal Investigator: Debra Sito

Submitted to People for Better TV

April 21, 2000

A Methodological Evaluation of the NAB Report
entitled
"A National Report on the Broadcast Industry's
Community Service"
(April 2000)

Executive Summary

The NAB report entitled *A National Report on the Broadcast Industry's Community Service- April 2000* concludes that radio and television stations contributed at least \$8.1 billion in community service from August 1998 through July 1999. This conclusion was derived from a survey sent by the NAB to all 11,147 commercial broadcasters. The contribution in the 2000 report is an increase over the \$6.85 billion figure in the NAB's previous report released in April 1998, which covered the period August 1, 1996 to July 31, 1997.

The breakdown of the \$8.1 billion in the April 2000 report is categorized into three categories as follows:

Projected value of PSA airtime donated	\$ 5.6 billion
Projected amount raised for charities/causes	\$ 2.3 billion
Projected value of on-air or off-air disaster relief campaigns	\$ 187 million

The breakdown of the \$6.85 billion in the April 1998 report was categorized slightly differently as follows:

Projected value of PSA airtime donated	\$ 4.6 billion
Projected amount raised for charities/causes	\$ 2.1 billion
Projected value of free airtime for debates, candidate forums and convention coverage	\$148.4 million

In the April 2000 report, the NAB did not offer an explanation as to why the value of disaster relief was estimated and included in the total contribution instead of the value of the free airtime for debates, candidate forums and convention coverage included in the April 1998 report.

As for methodology, the NAB report states that based on the experience of the 1998 report as well as a series of discussions with members of *The Advisory Committee on Public Interest Obligations of Digital Television Broadcasters (Gore Commission)* a number of

refinements were made to both the survey instrument and the data collection methods. The NAB gives a short list of five improvements. There is one clearly stated improvement to methodology which is that the current NAB survey project was expanded to include all commercial radio and television stations in the U.S. rather than only NAB and state association member stations. This is an improvement in that the survey is then not biased toward a specific group of member stations.

The remaining four claimed improvements are described in very brief, non-specific terms and the NAB does not provide detail on the extent that these improvements improve the validity of the survey and resulting projected community service contribution. Aside from the five claimed improvements, we have to assume that the other methodologies used in the April 2000 report remain the same as the April 1998 report. The validity of the April 1998 is questionable because there were many methodological flaws in the survey methods and the calculation of the projected contribution. In addition, some methodologies used in the April 1998 survey and report were vague or not clearly explained. Since the April 2000 survey and report retained many of the same methodologies, the validity of the April 2000 survey is also in question.

The one clear front that the NAB deserves credit for in the April 2000 report is the additional energy the NAB expended to disseminate the survey and ensure its completion by the maximum number of broadcasters. As opposed to just mailing the survey out, in April 2000 the NAB gave the broadcasters mail, fax and Internet options. Three waves of surveys were sent which gave stations multiple opportunities to respond and reminders to complete the survey were sent at regular intervals. As a result, nearly 5,700 local radio and television stations participated in the April 2000 survey, nearly 1,900 more stations than participated in the April 1998 survey. The survey completion rate for the April 2000 report was 51% on a weighted average basis (73% for television, 48% for radio), which was an improvement over the already solid 42% figure in the 1998 report. We agree with the NAB that this is an excellent response rate given that most mail surveys targeting an association's own members fall in the 20% - 30% response rates.

General Methodological Flaws

Similar to the 1998 survey, many of the survey methodologies in the April 2000 survey might have been reasonable but the methodologies were not detailed or defended.

The following methodological flaws that were in the April 1998 survey are still present in the April 2000 survey:

The survey was self-reported, which could skew it toward broadcasters that are more supportive of community service than the norm.

Answers in the survey were not verified by an independent party against the broadcasters' internal records. Thus, survey results are highly subjective.

Actual contributions reported by the broadcasters are extrapolated to project a contribution for the entire industry.

There was no analysis deriving the appropriate sample size needed to give the results a high degree of validity.

There is not a breakdown of the community service contribution from non-networked owned broadcasters and network-owned. This breakdown would have assisted in reviewing the community service activities of different types of broadcasters.

Self-Reporting

The data for both the 2000 and 1998 reports is self-reported by broadcasters and it is un-audited in that there was not an independent certified public accounting firm or other appropriate independent party reviewing the data for accuracy and consistency. Thus, we do not know if the broadcasters interpreted the questions in a similar way or checked their records to verify their actual participation in community service during the year surveyed. The recollections of the party filling out the survey at the TV or radio station could have been inaccurate but there was no auditing entity to verify the survey answers.

When studies are based on self-reported data, the results tend to be skewed because self-reporting usually attracts parties that are reporting in the affirmative. Broadcasters that are assisting the community would have an interest in reporting and probably due to their commitment, they would be more likely to have staff involved in the community service efforts that could spend time filling out the survey. Stations that did not return the survey might not have done so because they do not have staff involved in community service efforts or a commitment to community service. In the same vein, individual state broadcaster associations distributed the survey, which also skews the results in that industry "insiders" were managing the distribution. It stands to reason that the associations that are more committed to community service would manage the process so that the surveys of their constituents were completed thereby again skewing the results in the affirmative.

Sample Size

Just as in the 1998 report, in the 2000 report there is no calculation, using common statistical tools, of the appropriate sample size that would make this report valid. The overall response rate for the 2000 report project was 51% with the completion rate among television stations at 73%, and 48% for radio. (The report did not give a breakdown between non-network owned TV stations and network.) The NAB report claims this response rate is unusually high; even among association members most mail surveys tend to fall in the 20% to 30% response range. Nonetheless, a high response rate does not indicate validity of a sample size. In addition, similar to the 1998 report, for the 2000 report, the NAB sent the completed surveys to Public Opinion Strategies, an Alexandria-based research firm, to be tabulated and analyzed. Was this

research firm an independent party? The report gives no evidence on this matter

Extrapolation

In the 2000 report, the total projected value of PSA airtime donated (\$5.6 billion) by all television and radio stations is extrapolated from the data actually reported by 51% of the stations that completed the questionnaires. In the 1998 report, the NAB also extrapolates the value of the PSAs but the 1998 report includes both the four major networks and typical television stations in their quantifications. The inclusion of data derived from both networks and typical TV stations probably “corrupts” the conclusions and the extrapolations because networks are different operationally from typical television stations and so including the data of both in the same conclusion is flawed. It is like collecting data on both apples and oranges and making conclusions. While extrapolating data is never as accurate as actual data, the extrapolation methodology for the PSA contribution in the 2000 report has improved by omitting the networks.

In the second and third categories of contribution in the 2000 report (amount raised for charities/causes and on-air and off-air disaster relief), the total contribution by all stations is also derived from extrapolating from the 51% of stations who actually reported data. Again, we take issue with the fact that extrapolation is an estimate, and not actual reported data.

As for the confidence level of the data, both the 2000 report and the 1998 report have 95% confidence levels. The 95% figure might be an appropriate confidence level for these types of surveys, but the NAB offers no evidence in support.

As an aside, the 2000 report cites that the average television station ran 142 PSAs per week and the average radio station ran 152 PSAs per week, both of which were increases over the 1998 report. However, the 1998 report included the network PSAs in calculating the total community service contribution, whereas the 2000 report had no mention of the network PSAs. The NAB does not disclose a reason for excluding the networks in the 2000 report.

The Five Claimed Improvements to the Methodology

The NAB lists five improvements to their survey instrument and methodology:

1. All broadcasters were included in the survey not just NAB and state association members.
2. The questionnaire was changed to measure all PSA time lengths more accurately.
3. The sections dealing with fundraising and PSA topics were expanded to incorporate a wider range of potential activities (breast cancer/women’s issues, children’s issues, etc).
4. Market size and revenue data for stations were linked to the survey data, allowing for more precise comparison of the sample to the actual universe. (A table is provided comparing (by market size) the total sample universe to the actual, respondent universe.
5. The data links made possible more precise weighting and sampling procedures to ensure the reported results are as accurate as possible.

Analysis of the Five Methodology Improvements Stated

We can analyze each stated improvement to determine if it increases or decreases the validity of the survey. However, because the NAB does not provide copious details on these improvements, it is impossible to derive the extent to which these improvements increase or decrease the validity of the survey. In addition, the NAB makes no commentary to this end.

1. Including All Broadcasters in the Survey

The first listed improvement is a highly positive action as it reduces survey bias and thus improves the validity of the survey.

2. PSA Lengths

The second improvement claim is that the questionnaire instrument was changed to more accurately measure all PSA time lengths. Improvements to the accuracy of measurement is typically a positive improvement to any survey. However, to assess the scope and merit of this change we need more detail to how the lengths were measured for the 2000 report vs. the 1998 report-but the NAB does not provide this detail

There is no evidence in the April 2000 survey that the methodologies for assigning a monetary value to PSA airtime is different from the April 1998 survey so we can assume that the methodologies remain flawed.

In the April 1998 report, to project the value of PSA airtime donated, the NAB multiplies the run-of-station rate by the average (or median) number of PSAs that broadcasters air. The usage of both multiples have methodological flaws:

Rate NAB uses the run-of-station price to estimate the value of donated air-time and not the price of the ad time when the PSAs actually ran. The run-of-station rate is the price an advertiser pays per ad to run many ads throughout all broadcasting times--both prime time hours and non-prime time hours. Thus, the run-of-station rate is an average of prime time and non-prime time rates. Most PSAs are run in non-prime-time hours where the rate is lower. Since the NAB is using the blended run-of-station rate, this figure is higher than the actually rate charged when the PSAs air. Even if the NAB were to claim that many of the PSAs are aired in prime time, it would have been more accurate to have the broadcasters report the time of day the PSAs actually ran and what the corresponding rates were at that time.

Number of PSAs There is an inconsistency in measurement for the networks vs. the broadcasters in the 1998 report because that report uses the average number of PSAs for

the broadcasters but the median number of PSAs for the networks. There are 4 networks that report and the median can really disguise the range in such a small data set.

In the April 2000 report, we can assume that the rate data remains flawed as there is no evidence to the contrary. However, the networks are excluded from the total number of PSAs in the 2000 survey. There is no explanation as to why the networks are suddenly excluded from the 2000 report,

In addition, similar to the April 1998 survey, a justification is never offered in the April 2000 survey as to why the report extrapolated the survey results in this category to all broadcasters that received the survey from the data of broadcasters that actually completed the survey.

3. Expansion of PSA and Fundraising Activities Included in the Survey

With respect to the April 2000 questionnaire, the NAB states that the sections dealing with fundraising and PSA topics were expanded to incorporate a wider range of potential activities. The problem is that inclusion of extra activities causes a comparison problem because in order to accurately compare the contributions of two different time periods, the same activities must be included in both time periods. One must raise a red flag when additional activities have been included in a second survey and at the same time the resulting contribution projection is higher in that second survey, as is the case in both the PSA and fundraising categories. One wonders how much of the increase is due to the inclusion of additional activities in the second survey and how much of the increase is due to a real increase in the level of community service. The 2000 report does not offer any commentary to clarify the matter.

4. 5. Linking market size and revenue data for the stations to the survey

The NAB claims that they linked market size and revenue data of the actual universe of stations to the survey data in the 2000 report. Thus, they refined their extrapolation methodology in 2000 by performing the extrapolation of the contributions by weighting the survey results of the stations that completed the survey by their market size and revenue data. This is a positive improvement because a chart in the report (page 8) shows that the number of stations completing the surveys is biased toward the smaller TV stations and the un-rated radio stations. While we take issue with extrapolating data in the 1998 and 2000 reports, it is commendable that the extrapolation is more refined in 2000 and thus more accurate.

Projection of On-Air or Off-Air Disaster Relief Campaigns

In the April 2000 report, a projected contribution of \$187 million related to on-air and off-air disaster relief campaigns is included in the \$8.1 billion estimate of broadcasters' community service. Forty-nine percent of TV stations and 57% of radio stations reported involvement in on-air or off-air campaigns. The NAB does not offer any explanation as to why disaster relief campaign dollars are included for 2000 replacing the free airtime for campaigns and candidates included in the 1998 contribution. In addition, we cannot ascertain if this \$187 million in on-air and off-air disaster relief is an increase or decrease from the 1998 report as this number was not reported in 1998. The 1998 report states only that 56% of broadcast stations say they ran on-air campaigns to aid victims of disaster while 42% say they ran a combination of on-air and off-air campaigns. Thus, the disaster relief contribution for both reports is incomparable. Since different data was reported for these two reports, we can assume that the questions relating to this category were probably different in the two respective questionnaires.

Local Issues Section

In addition to the \$8.1 billion contribution estimate, the 2000 report gives some clear non-monetary statistics regarding broadcasters' service with respect to on-air local issues support. The NAB cites that 65% of PSAs aired by the average radio station during the year surveyed for the 2000 report were about local issues. For the average TV station, the figure was 56%. Additionally, 65% of TV stations and 61% of radio stations aired local public affairs programs of at least 30 minutes in length every week.

In the 1998 report, the local issues section also reports some non-monetary statistics of the percentage of broadcasters' involved in local community service but it is a mix of many different types of service including on-air as well as off-air station involvement in activities such as donation drives and county fairs. The local issues section also includes off-air aid to disaster victims-now reported in 2000 as a separate category.

Thus, the local community service participation reported in 2000 (reported in percentages) cannot be compared to 1998.

Serious Study or Public Relations Brochure?

The aim of both the 1998 and 2000 reports seems to be to positively portray the community service efforts of the broadcasters rather than to present an unbiased analysis of the data the broadcasters are reporting. In form, the reports appear as public relations brochures rather than objective study documents. The only difference is that the 2000 report is a much thicker document filled with over 60 pages of anecdotal examples of broadcasters' community service and two pages of research methodology. The 1998 report had over 17 pages of anecdotal

examples as opposed to only one page describing the research methodology.

APPENDIX B

People for Better TV

Members

4/20/2000

Steering Group

Children Now
Civil Rights Forum on Communications Policy
Communications Workers of America
Consumer Federation of America
League of United Latin American Citizens
National Association of the Deaf
National Organization for Women
National Urban League
Project on Media Ownership
U.S. Catholic Conference

Other Coalition Members

Arab Community Center for Economic and Social Services (ACCESS)
American Academy of Child and Adolescent Psychiatry
American Academy of Pediatrics
American Documentary
American Foundation for the Blind
American Society for Deaf Children
A. Philip Randolph Institute
Appalshop
Arizona Consumers' Council
Association of Independent Video and Filmmakers
Benton Foundation
Branch County -NOW
Bridge Communications, Inc.
Bridge the Gap - Family Day Care Network
Carolina Peace Resource Center
Center for Information, Technology, and Society
Chicago Access Corporation
Chicago Media Watch
Childserv
Christian Communication Council of Metropolitan Detroit Churches
Chinese for Affirmative Action
Citizens for Independent Public Broadcasting
Citizens' Media Corps

Cobb County -NOW
Columbia Consumer Education Council
Community Technology Center's Network
Conference of Educational Administrators of Schools and Programs for the Deaf
Consumer Action
Cultural Environment Movement
Deaf Entertainment Foundation
Fairness and Accuracy in Reporting
Globalvision
Global Ministries United Methodist Church
Green Party of Metro Detroit
Interfaith Broadcasting Commission
Harlem Consumer Education Council, Inc.
Houston-Media Source
Illinois Campaign for Political Reform
Illinois Public Interest Research Group
Internews
Internews Interactive
Kartemquin Films Ltd.
Labor Council for Latin American Advancement
Latino Public Broadcasting
League of Women Voters - Los Angeles
Libraries for the Future
Loka Institute
LULAC-Houston District
MADD-Wayne County Michigan Chapter
Massachusetts Consumer's Coalition
Media Education Foundation
Mediascope
Metropolitan Christian Council: Detroit-Windsor
Mexican American Legal Defense and Educational Fund (MALDEF)
Michigan Association of Retired School Personnel
Michigan Consumer Federation
Michigan Institute for Nonviolence Education
MultiCultural Collaborative
NAACP
National Institute on Media and the Family
National Association of Latino Elected Officials (NALEO)
National Capital Area Trade Union Retirees
National Council of Churches
National Council on Alcoholism and Drug Dependence, Greater Detroit Area
National Hook-Up of Black Women, Inc
National Indian Telecommunications Institute

National Puerto Rican Coalition
NOW-Boston
NOW-California Action Center
NOW - Montgomery County
NOW-New York City
NOW-Western Wayne County Chapter
NOW-University of Michigan Campus Group
New California Media
Nuestra Palabra: Latino Writers Having Their Say
OMB Watch
Pacific News Service
Pontiac Area Urban League
Prevention Coalition of Southeast Michigan (PREVCO)
Rocky Mountain Media Watch
Self Help for Hard of Hearing People
Service Employees International Union - Local 46
Southeast Michigan Community Alliance
Southern Rural Development Initiative
Talenton Bilingue de Houston
Telecommunications for the Deaf, Inc.
Women's Institute for Freedom of the Press
Working In The Schools
WWNews
Youth Connection